

JENNIFER KELLY (CSB No. 193416)
jennifer@tyzlaw.com
RYAN TYZ (CSB No. 234895)
ryan@tyzlaw.com
ERIN JONES (CSB No. 252947)
ejones@tyzlaw.com
DEBORAH HEDLEY (CSB No. 276826)
deborah@tyzlaw.com
CIARA MCHALE (CSB No. 293308)
ciara@tyzlaw.com
SEAN APPLE (CSB No. 305692)
sapple@tyzlaw.com
CHIEH TUNG (CSB No. 318963)
chieh@tyzlaw.com
TYZ LAW GROUP PC
4 Embarcadero Center, 14th Floor
San Francisco, CA 94111
Telephone: 415.868.6900

Attorneys for Plaintiffs
Moonbug Entertainment Limited and
Treasure Studio, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MOONBUG ENTERTAINMENT
LIMITED and TREASURE STUDIO, INC.,

Plaintiffs,

v.

BABYBUS CO., LTD and BABYBUS
(FUJIAN) NETWORK TECHNOLOGY
CO., LTD,

Defendants.

Case No: 3:21-cv-06536-EMC

**SUPPLEMENTAL DECLARATION OF
CIARA McHALE IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND COSTS**

I, Ciara McHale, hereby declare as follows:

1. I am an attorney licensed to practice in the State of California and the Northern District of California. I am an attorney at Tyz Law Group PC and counsel of record for Plaintiffs Moonbug Entertainment Limited and Treasure Studio, Inc. (together, “Moonbug”) in this action. I have personal knowledge of the facts set forth in this declaration, and if called to testify, I could and would testify competently and under oath to the same.

2. Following the July 18, 2024 hearing on Moonbug’s motion for attorneys’ fees, Dkt. 630 (the “Motion”), I submit this supplemental declaration in support of the Motion. This declaration sets forth time and associated fees in this case since the filing of Plaintiffs’ reply in support of the Motion on December 4, 2023, Dkt. 655 that Plaintiffs seek to recover as part of the Motion, for all the reasons stated in its briefing on the Motion and argument at the July 18 hearing.

TYZ LAW GROUP TIME AND COST RECORDS

3. Consistent with customary legal practice, Tyz Law Group attorneys keep contemporaneous records of their time each day which are excerpted, compiled by software and sent to Plaintiffs each month in the regular course of business. I have reviewed these time entries as part of preparing this declaration.

4. Attached as **Exhibit 26** is a true and correct copy of a report derived from Tyz Law Group’s contemporaneous time records of entries for this litigation for the period of December 4, 2023 (the day of filing of Moonbug’s Reply in Support of Motion for Attorneys’ Fees and related declaration, Dkts. 655, 656) and July 19, 2024 (the last business day before the filing of this declaration). Some portions of Exhibit 26 are redacted based on attorney-client privilege and attorney work product.

5. Below is a table of the total time and associated fees for each attorney (at the hourly rates set forth in my original declaration in support of Moonbug’s motion, Dkt. 631 ¶¶ 4–12) from Exhibit 26:

Tyz Law Group PC			
Timekeeper	Hours	Hourly Rate	Fees
Ryan Tyz	45.4	\$690	\$31,326
Jennifer Kelly	31.3	\$690	\$21,597

Tyz Law Group PC			
Timekeeper	Hours	Hourly Rate	Fees
Erin Jones	9.9	\$650	\$6,435
Guinevere Jobson	5.6	\$650	\$3,640
Ciara McHale	79.8	\$600	\$47,880
Deborah Hedley	31.2	\$600	\$18,720
Sean Apple	36.9	\$500	\$18,450
Chieh Tung	36.8	\$475	\$17,480
Jonathan Downing	5.1	\$450	\$2,295
Stephanie Alvarez Salgado	4.5	\$450	\$2,025
Tiffany Weger	17.2	\$295	\$5,074
TOTAL	303.7		\$174,922

6. **Guinevere Jobson:** Guinevere Jobson is an attorney at Tyz Law Group. She is a member of good standing of the California State Bar and has practiced law in the State of California since 2007. Ms. Jobson graduated from American University's Washington College of Law. She has over 16 years of global experience in-house and as an intellectual property litigator and advisor. Prior to joining Tyz Law, Ms. Jobson served as General Counsel of Quantcast, an AI-powered digital advertising technology company where she oversaw all legal functions including intellectual property matters. Before going in-house, Ms. Jobson's substantive expertise focused on intellectual property and commercial litigation and counseling, representing clients across technology, Internet, and digital media/entertainment sectors at Fenwick and West. She also spent a year as visiting attorney with the intellectual property team at Allen & Overy (now A&O Shearman) in the firm's Paris, France office. Ms. Jobson's time spent working on this case has involved drafting and revising portions of Plaintiffs' court submissions and advising on matters relating to judgment enforcement. Ms. Jobson joined Tyz Law Group in 2024, after Moonbug engaged Tyz Law Group. The fees for her time, shown above, reflect and apply what would have been the applicable rate for her services at the time Moonbug engaged Tyz Law Group, which has since increased.

7. **Stephanie Alvarez Salgado:** Stephanie Alvarez Salgado is an attorney at Tyz Law Group. She is a member of good standing of the California State Bar and has practiced law in the State of California since 2021. Ms. Alvarez Salgado graduated from the University of Southern California, Gould School of Law. Prior to joining Tyz Law Group, Stephanie was a

1 litigator at Baker Hostetler LLP. Ms. Salgado's time spent working on this case has involved
2 conducting legal research. Ms. Alvarez Salgado joined Tyz Law Group in 2024, after Moonbug
3 engaged Tyz Law Group. The fees for her time, shown above, reflect and apply what would have
4 been the applicable rate for her services at the time Moonbug engaged Tyz Law Group, which
5 has since increased.

6 8. It is my view that the work performed by Tyz Law Group reflected in Exhibit 26
7 was reasonable given the amount at stake in this litigation (including but not limited to the
8 judgment as entered), the number of attorneys and tactics used by Defendants' counsel, the length
9 of the litigation, and the factual and legal complexity of the issues. These supplemental fees
10 include fees for time spent on Moonbug's Opposition to Defendants' Motion for Judgment as a
11 Matter of Law (Dkt. No. 662) and Opposition to Defendants' Motion for a New Trial (Dkt. No.
12 663), as well as time and efforts expended to enforce the judgment. The time spent by Moonbug
13 was reasonable, especially considering that much of it was for work opposing post-trial motions
14 that were either dispositive or could force the parties to relitigate this case. Tyz Law Group
15 exercised sound billing judgment and assigned tasks to personnel who could handle them most
16 efficiently, including to the appropriate attorneys when possible.

17 I declare under penalty of perjury that the foregoing is true and correct. Executed on
18 July 22, 2024.

19
20 /s/ Ciara McHale

21 Ciara McHale
22
23
24
25
26
27
28